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November 14, 2023

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## **VIA ECF**

Hon. Frederic Block United States District Court Eastern District of New York 225 Cadman Plaza East Brooklyn, NY 11201

Re: *United States v. Lanni, et al.*, Cr. No. 23-CR-443

Dear Judge Block:

We are counsel for Salvatore DiLorenzo, a defendant in the above-captioned matter. Mr. DiLorenzo was arrested on November 8, 2023 and released on a bail package that included conditions restricting Mr. DiLorenzo's travel to the Eastern and Southern Districts of New York and the state of Florida.

We write to request the Court approve Mr. DiLorenzo's travel to attend the funeral of Vincent Apicella, to take place at noon this Thursday, November 16<sup>th</sup> in Deposit, New York, which is in Delaware County, in the Northern District of New York. Mr. Apicella was a friend of Mr. DiLorenzo's, as well as the father of a long-time employee of Mr. DiLorenzo's company, PAL Environmental Safety Corporation. If his travel request is approved, Mr. DiLorenzo would travel to Deposit for the funeral on the 16<sup>th</sup> and return on the same day.

Mr. DiLorenzo has consulted with his assigned Pretrial Services Officer, Andrew Berglind, who does not oppose this request. We have also conferred with the United States Attorney's Office for the Eastern District of New York, which consents to Mr. DiLorenzo's request.

Respectfully,

/s/ Andrew M. Lankler
Andrew M. Lankler